



Submitted electronically via www.regulations.gov

Aug. 30, 2017

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Arlington, VA 22314-3428

Re: Proposed rule on corporate credit unions
RIN 3133-AE75

Dear Mr. Poliquin:

The Wisconsin Credit Union League (the League) is writing on behalf of Wisconsin's credit unions® and their nearly 3 million members to express its support for the National Credit Union Administration Board's proposed changes to 12 CFR Part 704 – Corporate Credit Unions. This proposal would:

- Positively change the calculation of Tier 1 capital and the treatment of retained earnings in consolidations;
- Create a retained earnings ratio target in meeting Prompt Corrective Action standards;
- Allow for the full and proper recognition of member perpetual contributed capital as Tier 1 capital once a corporate credit union reaches a minimum retained earnings ratio of 2.50%; and
- Recognize retained earnings acquired in a merger in accordance with Generally Accepted Accounting Principles (GAAP).

We agree with the Board and with comments submitted by Corporate Central Credit Union that these changes enhance transparency, reduce ambiguity, better align the capital regulations with treatment from other regulatory bodies and GAAP, and promote corporate credit unions' prudent building of retained earnings. We appreciate the Board's efforts in revising these rules.

Thank you.

Sincerely,

Paul Guttormsson
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The Wisconsin Credit Union League

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